

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-373/81-23

Docket No. 50-373

License No. CPPR-99

Licensee: Commonwealth Edison Company
P. O. Box 767
Chicago, IL 60690

Facility Name: LaSalle County Nuclear Station, Unit 1

Inspection At: LaSalle Site, Seneca, IL

Inspection Conducted: June 8-10, 1981

D. E. Miller/for
Inspector: P. C. Lovendale

6-22-81

D. E. Miller/for
Approved by: L. R. Greger, Acting Chief
Facilities Radiation
Protection Section

6-22-81

Inspection Summary

Inspection on June 8-10, 1981 (Report No. 50-373/81-23)

Areas Inspected: Routine, unannounced preoperational inspection of the radwaste management and radiation protection programs, including: organization, personnel qualifications and training, preoperational system testing, procedures, and IE Bulletins and Circulars. The inspection involved 26 inspector-hours onsite by one NRC inspector.

Results: No items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

- *B. B. Stephenson, Project Manager
- *R. H. Holyoak, Station Superintendent
- *F. W. Lawless, Rad/Chem Supervisor
- *C. W. Schroeder, Technical Staff Supervisor
- *J. H. McDonald, Training Supervisor
- *R. Kyrovac, QA Coordinator
- *L. Aldrich, Health Physicist
- *J. D. Williams, Radwaste Coordinator - Operations
- *R. Walker, Senior Resident Inspector, NRC

The inspector also interviewed several technicians and engineering assistants during the inspection.

*Denotes those present at the exit meeting.

2. General

This inspection, which began at 9:00 a.m. on June 8, 1981, was conducted to examine selected portions of the licensee's radiation protection and radwaste management programs to assess readiness for fuel loading.

3. Rad/Chem Technician (RCT) Training and Qualifications

The inspector learned that RCT shift assignments were being made in accordance with a "shift preference" scheme which allows RCTs to select their shift by seniority. This scheme has been shown to concentrate the most inexperienced (junior) RCTs on the back shifts with minimal supervision. The inspector reminded the licensee that a similar system at another CECO station contributed to significant problems identified during the Health Physics Appraisal. The performance and qualifications of RCTs assigned to the backshifts will be closely monitored during future inspections. This matter was discussed during the exit meeting. (50-373/80-45-01)

The inspector interviewed five RCTs to determine if they currently met the qualifications specified in Section 13.1.3.2 of the FSAR. Three of those interviewed, presently assigned to the back shifts, had considerable difficulty answering basic health physics questions. It appeared that they could not adequately perform the six activities required of individuals qualified in radiation protection procedures per Section 13.1.3.2 of the FSAR. The remaining two RCTs interviewed appeared to be capable of performing these six activities and appeared to meet the qualification requirements of ANSI N18.1-1971. The RCTs are not subject to any performance standards and there are no progression

steps for RCTs. These same circumstances were identified as a contributing factor to poor work quality during Health Physics Appraisals at other licensee facilities. These matters were discussed during the exit meeting and will be reviewed during future inspections. (50-373/81-23-01)

The licensee's RCT training program was reviewed during a previous inspection and found to be adequate in scope and content.^{1/} However, since many of the RCTs have not received any training in the "basics" of health physics for several years and have not been actively engaged in health physics work during the construction phase, it appears that additional training is needed. Such training should be completed before fuel load. Also, at the completion of this training, the licensee should certify each RCTs level of qualification (ANSI N18.1-1971 or "individual qualified in radiation protection procedures"). This matter was discussed during the exit meeting and will be further reviewed before fuel loading. (50-373/80-45-02)

During a previous inspection^{2/} it was noted that some of the instructors used to train the RCTs and sign off their qualification cards did not meet recommended education and experience requirements (ANS 3.1). Although this situation still exists, the licensee now requires that an appropriate individual (Rad/Chem Supervisor or Health Physicist) certify final qualification of each RCT. (50-373/80-45-03)

4. Organization

During a previous inspection^{3/} it was noted that the Rad/Chem Supervisor did not appear to meet Regulatory Guide 1.8, Revision 1, requirements for Radiation Protection Manager (RPM) as stated in the FSAR. The licensee submitted the Rad/Chem Supervisor's qualifications to NRR and stated that the Health Physics Coordinator and the Technical Staff Supervisor were qualified RPMs and would be available to assist the Rad/Chem Supervisor. Based on the support of these other health physics trained individuals onsite and additional health physics support available from the corporate organization, NRR found the health physics organization to be acceptable. (50-373/80-07-01)

During another inspection^{4/} it was noted that one of the Rad/Chem Foremen did not meet the ANSI N18.1-1971 requirements for a non-licensed supervisor because of his lack of experience in radiation protection. To improve this persons qualifications, the licensee assigned him to an operating station where he worked with experienced Rad/Chem Foremen for nine weeks. No additional problems were identified concerning this person's qualifications. (50-373/80-41-02)

- 1/ IE Inspection Report No. 50-373/80-45
- 2/ IE Inspection Report No. 50-373/80-45
- 3/ IE Inspection Report No. 50-373/80-07
- 4/ IE Inspection Report No. 50-373/80-41

The licensee has commissioned a consultant to perform a management assessment of the organizational structure, including the radiation protection section. The licensee has committed to implement appropriate changes, as necessary, based on the final recommendations of this study. This study is not yet complete. This matter will be reviewed during a future inspection. (50-373/81-04-04)

5. Solid Radwaste

The cycle condensate flow control valve (OWX-141), which is used to flush the decant tanks, is located about three feet from the tank with no intervening shielding. Failure of this single valve could have prevented decontamination of the decant tanks and associated piping. As a solution to this problem, the licensee replaced the single valve with two valves in parallel. This change means that a single failure will not prevent decontamination of the system. (50-373/81-11-01)

The decant tank overflow lines and drumming station drain lines are directed to floor drains which drain into the truck bay sump. Considerable splashing occurs when the overflow or drainage hits the floor drains; the splashing could increase contamination levels in the area. As a solution to this problem, a design change has been approved which calls for direct piping of these lines to the truck bay sump. No further problems were noted. (50-373/80-51-02)

The licensee stated that their solid radwaste operating procedures are still being revised. This matter was discussed during the exit meeting. (50-373/81-11-03)

6. Preoperational System Demonstrations

According to licensee personnel, the following system demonstration tests are in progress and at the percentage of completion indicated:

SD-WE-101A	Liquid Radwaste Equipment Drain Reprocessing	100%
SD-WE-101B	Floor Drain Reprocessing	54%
SD-WE-101C	Laundry Equipment and Floor Drain Reprocessing	100%
SD-WE-101D	Chemical Waste	58
SD-WE-101E	Equipment and Floor Drain	95%
SD-WX-101	Solid Radwaste	90%
	Offgas System	70%
	SBGTS	65%

Extensive weld repairs on the evaporator tube sheets have held up progress on the Floor Drain Reprocessing and Chemical Waste systems. The licensee stated that the evaporators should be ready for testing in four to six weeks.

7. Area Radiation Monitors (ARMs)

During a previous inspection, it was noted that three ARMs were poorly positioned and may not perform their intended function because of intervening shielding. Also, it was noted that several other ARM detector or alarm/read out positions could be improved. The station staff has submitted a change request to the corporate office. The inspector will continue to monitor the progress of this change request to ensure the system is functional. (50-373/81-04-01)

8. Respiratory Protection Program

During a previous inspection,^{5/} several problems with the licensee's respiratory protection program were identified including:

- a. Responsibility for the program had not been vested in one individual.
- b. Not all breathing air hose conformed to the color code policy at the plant.
- c. Mask storage instructions were not provided to responsible individuals.
- d. Individual mask cards did not indicate the actual date of medical approval.

The licensee has adequately resolved all of these problems. No further problems were identified. (50-373/80-07-03)

9. IE Bulletin No. 80-10

The licensee's action in response to IE Bulletin No. 80-10, "Contamination of Nonradioactive Systems and Resulting Potential for Unmonitored, Uncontrolled Release of Radioactivity to the Environment," were reviewed. The licensee identified several systems which could become contaminated through interfaces with radioactive systems. All of these systems have radiation monitors or will be sampled under procedure LCP 140-1. No problems were noted. (50-373/80-16-01)

10. IE Circular No. 80-14

The inspector reviewed the licensee's actions in response to IE Circular No. 80-14, "Radioactive Contamination of Plant Demineralized Water System and Resultant Internal Contamination of Personnel." Procedure LAP 1000-3 forbids consumption of plant demineralized water and the system is sampled on a routine basis. No problems were noted. (50-373/80-30-05)

^{5/} IE Inspection Report No. 50-373/80-07

11. Exit Meeting

The inspector met with licensee representatives (denoted in Section 1) at the conclusion of the inspection on June 10, 1981, and further discussed the inspection during a telephone conversation with Mr. R. Bishop on June 16, 1981. In response to certain items discussed by the inspector, the licensee:

- a. Stated that RCT shift assignments would be provided to Region III 30 days before fuel loading.
- b. Stated that a listing and certification of RCT qualification status will be submitted to Region III 30 days before fuel loading.
- c. Stated that some form of intensive retraining will be provided to RCTs prior to fuel loading.
- d. Stated that revised solid radwaste operating procedures should be completed by July 1, 1981.